

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:22-CV-22787-SCOLA/GOODMAN

LIORA SAMANDAROVA,

Plaintiff,

vs.

HOOKAH EXOTIX LLC,  
JEAN-CHRISTOPHE PITTMAN,  
AND ALEXANDRE ARKHIPOV,

Defendants.

\_\_\_\_\_ /

**PLAINTIFF'S INTERIM STATUS REPORT**

Plaintiff, Liora Samandarova, files her Interim Status Report pursuant to the Court's Scheduling Order and Order of Referral to Mediation [ECF No. 13], as follows:

**a) Have all defendants been served? If not, state the reasons.**

No. Plaintiff served Defendant, Alexandre Arkhipov, but was unable to serve Defendants, Hookah Exotix, LLC or Jean-Christophe Pittman. Mr. Pittman has been concealing his whereabouts, and Hookah Exotix, LLC, failed to have a registered agent available for service.

**b) Have all defendants responded to the complaint? If not, state the reasons.**

No. Only Defendant, Alexander Arkhipov, responded to the Complaint. The other Defendants were not served and so have not responded to it.

**c) If this is a class action, has a motion for class certification been filed? If so, what is its status?**

N/A.

**d) Have the parties agreed on and selected a mediator? Have the parties agreed upon a place, date, and time for mediation?**

Plaintiff emailed to propose a mediator but did not receive a response from Mr. Arkhipov.

**e) Have the parties engaged in informal settlement negotiations? If not, explain the reasons for the failure to do so. If yes, state the status of such negotiations (e.g., ongoing, impasse, etc.) and the relative prospects for resolution through informal means.**

No.

**f) Describe the status of discovery conducted to date, and identify whether the parties reasonably believe that they will be able to complete discovery by the Court's deadline. If not, explain the reasons.**

Plaintiff has not yet served discovery due to Mr. Arkhipov's failure to comply with the Court's Orders. Plaintiff intends to serve discovery, if necessary and intends to complete discovery prior to Court's deadline so long as Mr. Arkhipov timely responds and cooperates.

**g) Identify any other issues that the Court should be aware of that may affect the resolution of this matter or the schedule as currently set.**

The Court should be aware that Mr. Arkhipov has not complied with several of the Court's Orders, most recently ECF No. 20, and so Plaintiff anticipates that the progression of this case may be difficult based on the *pro se* defense and failure to comply with deadlines.

Dated this 19th day of January 2023.

s/Brian H. Pollock, Esq.  
Brian H. Pollock, Esq.  
Fla. Bar No. 174742  
[brian@fairlawattorney.com](mailto:brian@fairlawattorney.com)  
FAIRLAW FIRM  
135 San Lorenzo Avenue  
Suite 770  
Coral Gables, FL 33146  
Tel: 305.230.4884  
*Counsel for Plaintiff*